

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION  
2007 JUL 10 P 4:27

ALONZO AUSTIN  
Plaintiff,

DEBRA P. HACKETT, CLK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT ALA

V.

Case Number:

GLOBAL CONNECTION INC., 3:07-CV-042-MEF.  
OF AMERICA  
CEO/CFO - SAM Abdallah  
Rachelle Copeland  
and GLOBAL CONNECTION INC.  
OF ALABAMA ET, AL.  
Defendants,

PLAINTIFF ALONZO AUSTIN'S MOTION FOR LEAVE  
TO FILE MOTION FOR ORDER COMPELLING DISCLOSURE

Comes Now, the Plaintiff ALONZO AUSTIN,  
Pursuant to Federal Rule of Civil Procedure  
37(a) (1) (2) and (3) and respectfully  
moves this honorable Court for the  
entry of an order granting it Leave  
to file the instant Motion for  
Order Compelling Disclosure Pursuant  
to Rule 26(a) upon the following grounds

1. That the Defendant's GLOBAL Connection INC.  
OF AMERICA ET, AL. has failed to make complete  
disclosures pursuant to Rule 26(a) (B) (4) (D) More  
Specifically, Copies of billing Statement, Payments  
received, Credit Card Transaction, Checks  
Money orders payments, business insurance,

INCOME TAX. Statements For the  
2005 and 2006 Tax year, ~~INVOICES~~  
For the months of November and December, 2005  
and Document showing Date and time phone  
Service was terminated Contractually  
With terms and Conditions attached..

2. That Plaintiff ALONZO Austin, has  
in good faith conferred by Certified  
MAIL with a return receipt See EX. A  
Letter attached in an effort to  
Secure the disclosures without Court  
Action, Addressed to the Defendant's

Respectfully Submitted.

by, Alonzo Austin, pro se  
ALONZO Austin

CERTIFICATE OF SERVICE

I ALONZO AUSTIN hereby  
Certify that I have served

Copies of the foregoing document upon the Defendant's  
GLOBAL CONNECTION INC. OF AMERICA et al.

C/O MCKOON THOMAS, & MCKOON  
925 Broad Street  
P.O. Box 3220

Phoenix City, AZ. 36868-3220

By placing same in the United States mail, postage  
Prepaid on this 10<sup>th</sup> day of July, 2007

by, Alonzo Austin, pro se  
Alonzo Austin

1321 Oliver-Carlis Rd.  
Tuskegee, AZ. 36083  
Ph. # (334) 727-5474

EXHIBIT 'A'1051 Via Certified Mail

June 29, 2007

ALONZO AUSTIN Prose

1321 Oliver-Carlis Rd.

Tuskegee, Al. 36083

(334) 727-5476

GLOBAL CONNECTION INC. OF AMERICA et.al,

c/o MCKOON, THOMAS &amp; MCKOON

925 broad Street

P.O. Box 3220

Phenix City, Al. 36868-3220

Re: ALONZO AUSTIN VS. GLOBAL CONNECTION INC.  
Case No. 3:07-CV-42-MEF

Dear: MR. MCKOON,

Pursuant to Rule 37(a) (Motion for Order Compelling Disclosure or Discovery) this Letter is a good faith attempt to Ascertain the initial Disclosures Pursuant to Rule 26(a)(1) Promised by you Due by the 1<sup>st</sup> day of June 2007.

I mailed my initial Disclosures on May 31, 2007 to you Certified Mail.

With a Returned receipt dated June 8, 2007 Signed by Amberly Watson. there is also the Court order Compelling exchange by June 18, 2007 Please Comply within the Next 5 working days. Thanks,  
Alonzo Austin

EXHIBIT A

Certification

## SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

## 1. Article Addressed to:

Global Connection Inc.  
c/o McKeon, Thomas & McKeon  
925 Broad Street  
P.O. Box 3220  
Phoenix City, AZ  
36868-3220

2. ZIP+4® 7006 2760 0001 7559 1220

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

## COMPLETE THIS SECTION ON DELIVERY

## A. Signature

X AMBEWY WATSON

☐ Agent  
☐ Addressee

## B. Received by (Printed Name)

AMBEWY WATSON

C. Date of Delivery

7-2-07

## D. Is delivery address different from item 1?

If YES, enter delivery address below:

☐ Yes  
☐ No

EXHIBIT A

## 3. Service Type

- ☒ Certified Mail  
☐ Registered  
☐ Insured Mail  
☐ Express Mail  
☐ Return Receipt for Merchandise  
☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

UNITED STATES POSTAL SERVICE  
MONITORING SERVICE  
02 JUL 2007 PM 3:11

First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

ALONZO AUSTIN  
1321 OLIVER-CARLIS RD,  
WOLFEGER, OR, 97083

0003